

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FT. LAUDERDALE DIVISION
CASE NO. 00-6025-CIV-MIDDLEBROOKS
MAGISTRATE JUDGE: BANDSTRA

ADVOCATES FOR THE DISABLED,
INC., a Florida not-for-profit corporation,
PETER SPALLUTO, individually, and
ERNST ROSENKRANTZ, individually,

Plaintiffs,

vs.

SEA CASTLE RESORT MOTEL
PARTNERSHIP, a Michigan General
Partnership, and MICHELE BROWNELL,
General Manager of Sea Castle Resort Inn,

Defendants.

01 JAN 22 AM 10:59
CLARET DIST. CT.
CLERK - MIAMI
S.D. OF FL.

PLAINTIFFS' INITIAL RULE 26 DISCLOSURES

Plaintiff, ADVOCATES FOR THE DISABLED, INC., a Florida not-for-profit corporation,
PETER SPALLUTO, individually, and ERNST ROSENKRANTZ, individually, by and through
undersigned counsel, file their Initial Disclosures pursuant to Rule 26 (a) (1) of the Federal Rules
of Civil Procedure.

1. The following individuals are known to Plaintiff to be likely to have discoverable information
relevant to disputed facts.

- a. Ernst Rosenkrantz
c/o Fuller, Mallah & Associates
1111 Lincoln Road, Suite 802
Miami Beach, FL 33139
(305) 538-6483

Subject: Barriers to access existing at the subject property. Information regarding Advocates
for the Disabled, Inc.

NON-COMPLIANCE OF S.D. Fla. L.R.

SIA 1

42
W/C

CASE NO.: 00-6025-CIV-MIDDLEBROOKS
Plaintiffs' Initial Disclosure
Page 2

- b. Peter Spalluto
610 East Sample Road
Pompano beach, Florida 33064

Subject: Barriers to access existing at the subject property.

2. Description by category of documents, data or tangible things relevant to disputed facts
(copy of documents provided to defendants):

a. Broward County tax record indicating ownership of LANCASTER SEA CASTLE
RESORT which is subject to this complaint.

b. Broward County tax record indicating ownership of the property on which the subject
LANCASTER SEA CASTLE RESORT is located.

c. Title records indicating ownership of LANCASTER SEA CASTLE RESORT which
is subject to this complaint and any mortgages on the property.

d. Broward County property appraiser document indicating ownership of property.

e. Initial investigative report identifying the existence of barriers to accessibility and
violations of the Americans with Disabilities Act including photographs of the subject property

3. Plaintiffs have made no claim for damages in this action.

4. There are no insurance agreements relevant to this action.

CERTIFICATE OF SERVICE

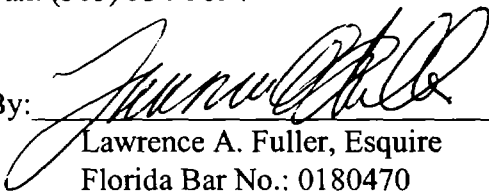
I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by mail
on this 19th day of January, 20001, to:

Amy J. Galloway, Esq.
Duke, Mullin & Galloway, P.A.
1700 East Las Olas Boulevard, PH-1
Fort Lauderdale, Florida 33301

CASE NO.: 00-6025-CIV-MIDDLEBROOKS
Plaintiffs' Initial Disclosure
Page 3

Respectfully submitted,

FULLER, MALLAH & ASSOCIATES, P.A.
Attorneys for Plaintiffs
1111 Lincoln Road, PH 802
Miami Beach, FL 33139
Tel: (305) 538-6483 - Dade
Tel: (954) 463-6570 - Broward
Fax: (305) 534-9894

By: 
Lawrence A. Fuller, Esquire
Florida Bar No.: 0180470

W:\WPDocs\A.D.A\1252-CYNTHIA BECKMAN\InitialDisclose.wpd